



NATIONAL ASSOCIATION OF FLIGHT INSTRUCTORS

EAA Aviation Center; PO Box 3086, Oshkosh, WI 54903-3086, 920-426-6801, FAX 920-426-6560
<http://www.nafinet.org>

FAA-01-11133-2077

DEPT. OF TRANSPORTATION
DOCKETS
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May 6, 2002

Docket Management System, US DOT
Room Plaza 401
400 Seventh St. SW
Washington D.C. 20590-0001

Dear Sir:

RE: Comments to Docket No. FAA-2001-11133; Notice No. 02-03

NAFI (National Association of Flight Instructors) is the professional society for flight instructors world-wide. With a membership of nearly 5,000, NAFI is the foremost representative of the flight instruction community and is the only association solely dedicated to raising and maintaining the professional standing of the flight instructor. NAFI programs, activities and events are known throughout the world for supporting quality flight instruction and supporting the aviation education community. A team of NAFI Master Instructors were involved in the development of this response.

General Comments

The sport pilot / light-sport aircraft proposal is one of the most significant rulemaking proposals FAA has developed for the benefit of flight training and new student starts in the last half century. It will offer a dramatic opportunity for individuals who have always wanted to fly for fun, but found the process too expensive, too time consuming or too complicated. It will make aviation safer and more accessible by making pilot training and aircraft ownership more affordable for many.

The regulatory and commerce environment that these rules will create will also positively impact the entire aviation community, in both private sector and government. Some will see these changes as simply a "coming of age" for the ultralight community as more sophisticated aircraft have developed from this movement. Others will see this as a "renaissance" in the pilot licensing which will be a carry back to the 1930s and 1940s when simpler pilot training and proficiency requirements equaled the simplicity of flying then (and the simplicity of many forms of recreational flying today). Still others will see this as a new growth area of "airborne sports opportunities" that will be as accessible as other leisure outlets in a new economy and society.

The opportunities created by “sport pilot / light sport aircraft” is all these things. It should, if enabled by the regulations and supported by the manufacturing and service industry and the pilot and flight instructor communities, equate to an opportunity for more flight activity and aircraft ownership -- “a good thing” for all of aviation. A separate, but important, element is that these regulatory changes should improve public confidence in the government oversight of recreational flying.

Aviation is at a supply and demand crossroads. Many industry experts indicate a concern of unacceptable levels of student starts, availability of flight instructors, and availability of aviation maintenance technicians. With more people expected to enter, remain in, or return to an involvement in flying, all of these declining factors can be reversed. Lower entry barriers could reverse the long-standing dropout rate of student pilots. Some will make “sport pilot” their destination, whether they are new to flying or returning to flying after many years. Others will join the ranks of aviators through a more affordable entry point, and move on to provide additional “supply” to the aviation industry’s dwindling human resources.

The “feeder system” for new pilots, which through the decades has depended on those receiving their flight training in the military or as a result of the GI Bill privileges, is long past. “Lower barriers to entry” to the world of flight can be and should be an important element of refreshing the US pilot population ranks. The sport pilot certificate will follow the FAA’s overall format that applies to all pilot certificates (with eligibility, training, and experience requirements), but it will be easier to earn than the recreational or private pilot certificate. An added benefit of the regulatory change will be that flight time logged as a sport pilot will count toward more advanced pilot certificates.

A major problem in flight training is the “drop-out” factor; a situation that sees many people complete a few hours of training, perhaps even through solo flight, then lose interest. We need to uncover why that occurs and take steps to remedy it. One possibility is that the growing complexity of private pilot training is not meeting the type of flying most of these people want –which is the simple ability to fly close to home as a recreational pursuit. This is why there has been such impressive growth in the ultralight community. Sport pilot will meet that need for a lower cost and less time-consuming entry point to flight in a variety of aircraft categories, while assuring the necessary training to maintain safety.

The two newly created aircraft categories will add significantly to the market-expansion possibilities. The new category available for two-seat ultralight trainers, and ultralights that do not meet the FAR Part 103 parameters, to transition to an FAA airworthiness certificate will provide additional safety to the operation of these aircraft. It will also improve public confidence in the perceived safety of these operations. Additionally, the new special light-sport airworthiness certificate will allow manufacturers to build and sell ready-to-fly light-sport aircraft that can be used for personal pleasure flying, flight instruction, and/or rental purposes. This will allow growth in the in the service industries (operation, maintenance and flight instruction) at levels reminiscent of the 1970’s when general aviation aircraft production drove the volume of activities.

There are a number of critical components of the existing aviation infrastructure that will require attention, development and / or adjustment for the sport pilot / light sport aircraft opportunity to reach its full potential. These include: the availability of new light sport aircraft, training for pilots, instructors, and mechanics; FAA designation of new (sport pilot-specific) pilot examiners and new (light-sport aircraft-specific) designated airworthiness representatives; aircraft financing and insurance for aircraft, pilots, instructors and manufacturers. Also critical will be acceptance and support of the flight training community, airport management, and airport system planners at all levels of government.

Many of these necessary “change elements” will be in the government sector. As a part of the sport pilot / light-sport aircraft effort, the FAA is exercising leadership in “changing the way government regulates.” The proposed requirement for the industry to establish consensus standards for aircraft design, production, quality assurance and continuing airworthiness will challenge both government and the private sector to adjust the relationship of between the public and private sectors. FAA’s commitment to this process is already in motion with the establishment of the ASTM International Subcommittee for Light-Sport Aircraft. Efforts to support the success of the new regulations are being worked on a parallel time track and in collaboration with the industry with the actual rulemaking process. These include the development of guidance material for the private sector and directives for the Agency requirements. All affected disciplines of the Agency including airports and aviation security are being involved.

State and local governments will be impacted by these changes. Airport system planning, airport standards and funding will eventually need to accommodate and difference type of operational flight activity and volume. State aviation agencies, public and private airport owner / operators and local zoning entities will eventually need to consolidate light sport aircraft operations into the picture of the aviation community.

Also significant to the value of these changes is the increase in public confidence in government oversight of recreational flight activity. Unfortunately, since September 11, the general public – which before that date had a “not involved, peaceful tolerance” of general aviation – has a much different view of all flight activities. There appears to be a higher public expectation of government control of aviation – regardless of a lack of demonstrated threat assessment. Government registration of airmen and aircraft that previously were only voluntarily registered with non-government organizations, will add to the public and law enforcement confidence. Additionally, the actual expectations of improved safety resulting from new minimum standards for airmen, aircraft design, construction and continued operation will bolster public confidence.

FAA is to be commended on the completeness and justification of the proposed rules. This proposal is one of the best researched and written in recent memory. NAFI congratulates the FAA team that developed this proposal in consolidating input from very diverse operating environments into a comprehensive, but responsive proposal.

NAFI Commitment of Support

Specific Comments

Our specific section-by-section comments are as follows:

Reference Docket No. FAA-2001-11133

The following comments identify issues for the NPRM – Certification of Aircraft and Airmen for the operation of Light-Sport Aircraft.

FAR Part 21

Revise 21.186 (c) (5) to delete the “pilot flight-training manual” from the list of information that will be made available to an interested person.

Justification: This information is general information not normally provided by an aircraft manufacturer, but by the FAA and other third parties. NAFI also questions whether or not this reference was a mistake and is simply another reference to the required pilot operating handbook mentioned earlier in the same sentence.

FAR Part 61

Paragraph 61.5 The proposed NPRM does not provide for a powered parachute “class” ratings to be added to 61.5. In addition the proposed changes do not account for the re-codifying of the current paragraph 61.5 (b) (5) aircraft type ratings which the NPRM proposes to be replaced with a 61.5 (b) (5) weight shift “class” ratings.

Revise 61.5: To add powered parachute “class” ratings of land and sea. Renumber 61.5 to reflect the additions to the paragraph.

Justification: There currently are both land and sea powered parachute aircraft.

Suggestion: Remove paragraphs 9(ix) from the proposed 61.107(b) and add a paragraph 61.116 as follows:

“61.116 Powered Parachute Limitations.

“(a) The holder of a private pilot certificate with a powered parachute rating may not exercise the privileges of those certificates at night unless they have obtained training from an authorized instructor in night operations in the respective category of aircraft and have received a logbook endorsement to that effect.”

Revise: The proposed 61.191 to allow a current registered ultralight instructor pilot who also is a holder of a Certificated Flight Instructor certificate to add the Sport Pilot Instructor rating to their CFI by simply showing evidence of having already provided ultralight training. This would be done by adding a statement to the proposed table as follows:

The holder of a Certificated Flight Instructor Certificate may add an appropriate category Sport Pilot Instructor rating to their certificate without meeting the

requirements of 61.183(c) if the applicant presents to an FAA Flight Standards office their flight instructor certificate and a notarized statement from an FAA recognized ultralight training organization stating that the applicant is registered as a ultralight instructor with an appropriate rating obtained prior to (36 months after the effective date of this rule).

Justification: The holder of a Certificated Flight Instructor certificate has already shown, to the satisfaction of the Administrator, that he or she has met all the required knowledge requirements for the certificate they hold. In addition this individual has also already shown and demonstrated the instructional ability required (category specific) by successfully participating in an ultralight training exemption program facilitated by an industry organization.

FAR Part 91

Revise 91.109 by adding a paragraph (d) to create the definition of dual controls for a powered parachute:

“91.109 (d) In the case of a powered parachute full dual controls are defined as a configuration that allows, while in flight, for the instructor and student to manipulate, throttle, engine kill switch, and steering lines.”

Justification: This definition is necessary for this category of aircraft since controls are completely different from any existing aircraft control system.

Revise proposed paragraph 91.131(b)(2) to:

(2) Notwithstanding the provisions of paragraph (b) (1) (iii) of this section, no person may take off or land a civil aircraft at those airports listed in section 4 of Appendix D of this part unless the pilot in command holds at least a private pilot certificate, *a recreational pilot certificate and has met the requirements of 61.101(d)*, or a sport pilot certificate and has met the requirements of section 81 of SFAR 89.

Justification: The FAA has proposed to add to the privileges of a recreational pilot certificate the ability to operate in Class B airspace. Because the training required for a recreational pilot certificate is greater than that of a sport pilot certificate, we believe that a recreational pilot should have all the same privileges as a sport pilot certificate.

SFAR No. 89

Revise Section 33 (c)(11) recovery from partial canopy collapse as follows:

Section 33 (c)(11) *“Simulate recovery from partial canopy collapse (powered parachute only)”*

Justification: This requirement has been misinterpreted to mean that an instructor must actually cause a canopy collapse. NAFI believes that this revision, to allow for simulation of a partial canopy collapse, will better define the task to be performed and enhance flight-training safety.

Revise Section 33 (c)(12) by removing the requirement to provide flight instruction on a meta-stable stall.

Justification: This is a design and rigging issue not a flight training issue. A properly designed and rigged powered parachute will not experience a meta-stable stall. This requirement is akin to requiring a private pilot to have flight training on the landing of an aircraft without elevator controls. The subject of meta-stable stall avoidance for a sport pilot is one of ensuring proper rigging of the canopy and would be addressed during the training segments on proper rigging.

Revise Sections 35 (e), 73(b)(9), 83, 121-(3)(iv) and 135(e) to delete the restriction of 87 knots.

Justification: There is no apparent reason to limit sport pilot students of light sport aircraft with a V_H of less than 87 knots. For student safety, the low stall speed is relevant not the top speed. This requirement would require flight schools/FBOs to have two sets of aircraft - one set slow and the other faster- to provide training/rental. An aircraft purchaser should be allowed to train in the light sport aircraft they purchase.

Revise Section 55 (g) to reduce the minimum flight time requirements to obtain a sport pilot certificate with powered parachute privileges from 20 hours to 10 as follows:
“Section 55 (g) powered parachute category privileges, 10 hours flight time, *including 10 flights in a powered parachute receiving flight training from an authorized instructor and at least 2 hours solo flight training in the areas of operation listed in Section 53 of the SFAR,*

- (1) *1 hour cross-country flight training;*
- (2) *10 takeoffs and landings to a full stop (with each landing involving a flight in the traffic pattern) at an airport;*
- (3) *One solo cross-country flight of at least 25 nautical miles total distance and one segment of the flight.....”*

Justification: The type and nature of powered parachute operations is closer to that of self-launched gliders than it is to airplanes. Powered parachutes operate at slow speeds generally for shorter periods of time than traditional aircraft and like gliders most often operate in the general area of landing facility. NAFI has evaluated the proposed requirements for a sport pilot certificate and believe that a new student could complete all the required tasks at a required minimum level of proficiency in 10 hours total time. The requirement for a private pilot certificate with a glider rating is only 10 hours of operation. NAFI is proposing that the requirements for a sport pilot certificate with a powered parachute rating roughly parallel the requirements for a glider certificate. In addition, NAFI is aware that the FAA had previously developed a set of standards for a possible recreational pilot certificate with a powered parachute rating. The earlier proposal also only called for a total of 10 hours of training. NAFI is unaware of any additional requirements that would necessitate 20 hours of training.

Revise Section 133 by adding a new paragraph to allow sport pilot instructors to tow light sport aircraft as follows:

Section 133 What privileges do I have if I hold a flight instructor certificate with a sport pilot rating?

(a) You are authorized, within the limitations of your flight instructor certificate with a sport pilot rating, to provide training and logbook endorsements for:

- (1) A student pilot certificate to operate light-sport aircraft;
- (2) A sport pilot certificate;
- (3) A sport pilot privilege;
- (4) A flight review for a sport pilot;
- (5) A practical test for a sport pilot;
- (6) A knowledge test for a sport pilot; and
- (7) A proficiency check for an additional category or class and make and model privilege for a sport pilot certificate or flight instructor certificate with a sport pilot rating.

(b) A sport pilot instructor may for compensation tow an ultralight or a light sport aircraft if:

- (1) The instructor meets the requirements of paragraph 61.69 (a)(2) through 61.69 (a)(6).

(c) A sport pilot instructor may for compensation demonstrate an aircraft in flight to a prospective buyer.

Justification: The towing of hanggliders is currently done on a regular basis on an exemption issued to the United State Hanglider Association. This proposed rule should provide at least one means to allow the continuation of this activity under the proposed sport pilot and light sport aircraft proposals. EAA does not believe that allowing an instructor to tow ultralights and light sport aircraft completely solves the need to have an appropriate method for current ultralight training aircraft to be used as towing aircraft by sport pilots but it does provide one method to address this need in the industry.

In regard to demonstrating aircraft to prospective pilots, current ultralight dealers do this on a regular basis as ultralight instructors. Since sport pilot instructors are authorized to provide flight instruction for hire in light sport aircraft, it would seem appropriate and consistent with current practices to allow a sport pilot instructor to demonstrate aircraft to a prospective buyer for compensation as they have been doing as an ultralight instructor to date.

Practical tests

On page 5406, the NPRM details Section 57 titled "What tests do I have to take to receive a sport pilot certificate?"

(b) Practical test. You must pass the required practical test on the applicable areas of operation listed in Sections 51 and 53 of this SFAR that apply to the light-sport aircraft privilege you seek.

(1) Before you can take the practical test for a sport pilot certificate, you must receive a logbook endorsement from the authorized instructor who provided you with flight training on the areas of operation specified in sections 51 and 53 of this SFAR in preparation for the practical test. This endorsement certifies you meet the applicable aeronautical knowledge and experience requirements and are prepared for the required practical test.

(2) The practical test will be administered in accordance with 14CFR 61.43, 61.45, 61.47 and 61.49.

We recommend the paragraph (2) be added to ensure that the test is covered within the Practical Test Standards guidelines and FAA Order 8710.3. The addition of sport pilot privileges for other category/class is addressed in Sections 61, 63, and 65.

Spin training

We found an inconsistency in spin training requirements in current regulations and policies.

Section 119. What tests do I have to take to get a flight instructor certificate with a sport pilot rating? To obtain a flight instructor certificate with a sport pilot rating, you must pass the following tests:

- (1) Knowledge test. -----
- (2) Practical test. ----
- (3) Receive a logbook endorsement from an authorized instructor indicating that you are competent and possess instructional proficiency in stall awareness, spin entry, spins, and spin recovery procedures after you have received flight training in those training areas in an airplane, glider, or weight-shift-control aircraft, as appropriate, that is certificated for spins;
- (4) Demonstrate you are able to teach stall awareness, spin entry, spins, and spin recovery procedures in an airplane, glider, or weight-shift-control aircraft, as appropriate. If you haven't previously failed a test based on this requirement, and you provide the endorsement required by paragraph (b)(3) of this section, an examiner may accept it instead of the demonstration required by this paragraph; and
- (5) If you are taking a retest because you previously failed a test based on the requirement of paragraph (b)(4) of this section, you must pass a test on stall awareness, spin entry, spins, and spin recovery instructional procedures in the applicable light-sport aircraft that is certificated for spins.

Recommendation 1: In Section 119(b)(4), the word “it” makes the wording vague. Recommend changing the section to read “. . . an examiner may accept *the endorsement* instead of the demonstration . . .”

Recommendation 2: In Section 119(b)(5), we recommend changing “If you are taking a retest” to “If you are testing” to remove some wordiness.

Recommendation 3: Clarify Section 119(b)(5), the phrase “. . . you must pass a test on stall awareness, spin entry, spins, and spin recovery *instructional procedures* in the applicable light-sport aircraft that is certificated for spins.” What are “instructional procedures?” This terminology was used in FAR 61.183, but what does this mean? Aren't we testing instructional competency and instructional proficiency? Perhaps a better phrase would be “. . . you must pass a test on stall awareness, spin entry, spins, and spin recovery *instructional competency and proficiency* in the applicable light-sport aircraft that is certificated for spins.” This should also be changed in FAR 61.183.

Recommendation 4: In Section 119(b)(5) the phrase, “. . . in the *applicable light-sport aircraft* that is certificated for spins” is vague. If the practical test failure is in an airplane, the retest must be done in an airplane. “Applicable” does not convey that concept. Recommend the phrase be changed to read, “. . . in *an aircraft of the applicable category and/or class of light-sport aircraft* that is certificated for spins.”

Recommendation 5: Change Section 119(b)(5), from the phrase “. . . you must *pass a test on stall awareness*” to add the word *practical* so as to read “. . . you must *pass a practical test on stall awareness*.” This change clarifies the type of test.

Recommendation 6: Spin training required for sport pilot flight instructor qualifications presumes the aircraft are fully tested and certified in spin behavior. Section 119 states the training must be done in an aircraft certificated for spins. We recommend that the light-sport aircraft be clearly placarded that the aircraft is, or is not, certificated for spins. If the aircraft is not certificated for spins, there should be a limitation included in the aircraft documentation.

Recommendation 7: SFAR 89 does not say that the spin training has to be done only in light sport aircraft. The flight instructor candidate could receive training in an airplane single engine land, for example, then take the test in a light-sport aircraft. If the applicant fails the test, Section 119 says “applicable light sport aircraft.” Despite an earlier recommendation, why couldn’t the applicant take the retest in a normal category airplane certificated for spins? For example, I am private pilot airplane single engine land. I now want to become a flight instructor in light sport aircraft. I do my spin training in an airplane single engine land, but I fail the practical test because I could not teach spin recovery procedures. I must then actually demonstrate this instructional knowledge in flight. But to do the spins, I want to bring the normal category airplane I used for the spin training. Section 119 seems to prohibit that. We recommend a review of this wording to be certain it deals correctly with spin training and testing.

Confusing sentence

The following paragraph appears on page 5387 of the Federal Register Proposal: “You would be required to operate a light-sport aircraft in accordance with part 91 but could not carry more than one passenger, or operate for a purpose other than sport and recreational flying, such as carrying a passenger for compensation or hire. **You could share the operating expenses of a flight with a passenger, and you could demonstrate an aircraft in flight to a prospective buyer unless you are an aircraft salesperson.**” The bold sentence does not make any sense.

Traffic patterns

The NPRM on page 5394 provides the following discussion. “Proposed section § 91.155 would be amended by revising paragraph (b) to include the two new categories of aircraft that would be permitted to operate in Class G airspace. The at-night, powered parachutes and weight-shift-control aircraft could be operated when the visibility is between 1 and 3 statute miles. They would have to remain clear of clouds if operated in an airport traffic pattern within one-half mile of the runway. These provisions currently apply only to

airplanes. Although they have different control characteristics, the FAA has determined that weight-shift-control aircraft and airplanes should be permitted to operate similarly in the NAS. Powered parachutes are similar in many ways to helicopters, but do not have the capability to hover or back up, which affords helicopters more maneuverability. Therefore, the FAA is proposing that powered parachutes may be operated in an airport traffic pattern; however, to remain in compliance with § 91.126, they must “avoid the flow of fixed-wing aircraft similar to helicopter operations.” We discovered a problem with this proposal. To have powered parachutes use the same traffic pattern as general aviation aircraft is not a safe rule. The powered parachute can fly circles in a 20' radius and only fly at 30 mph. To have them perform downwind, base & final legs would take forever and this is not going to be compatible with the 100 mph aircraft wishing to enter the pattern. We recommend that the powered parachute should use a right hand pattern if the standard at the airport is a left hand pattern. The powered parachute should not use the runway if there is traffic in the pattern, but use another section of the airport or the grass along the runway as to stay clear of the active. We are opposed to having the slow powered parachutes in the same pattern as faster general aviation aircraft.

Night Operations

The proposed regulation reads:

§ 91.155 *Basic VFR weather minimums.*

(b) * * *

(2) Airplane, powered parachute. If visibility is between 1 and 3 statute miles during night hours, and you are operating in an airport traffic pattern within one-half mile of the runway, you may operate an airplane or powered parachute clear of clouds.

We are concerned about operations at night for powered parachute. Powered parachute aircraft should be eliminated from this paragraph. We suggest that allowing these aircraft to operate at night with minimum external lighting is contrary to safety in the National Airspace System. We recommend deleting this paragraph.

Self launch glider

Proposal states that light sport aircraft includes gliders.

A light-sport aircraft has:

1. has maximum takeoff weight of 1232 lb.
2. has maximum speed in level flight with maximum continuous power (V_H) of 115 knots CAS
3. has maximum stall speed in landing configuration of 39 knots CAS
4. carries no more than two occupants
5. is single engine powered
6. if powered, would be limited to a fixed or ground adjustable propeller
7. is unpressurized
8. has fixed landing gear

There are three glider launch types: aero, ground, and self. The proposal treats gliders as unpowered light-sport aircraft, but these gliders may, in fact, have engines and still be in the light sport category. “Powered” gliders may have controllable pitch propellers for

performance and for propeller feathering for soaring flight. It is not clear that “repositioning” the propeller for soaring flight is acceptable for a sport aircraft. Gliders often have retractable landing gear to remove drag for soaring flights. They are not complex to design, manufacture, and maintain, nor are they are complex to operate in flight. They only involve one wheel. Gliders should be allowed to have one retractable landing gear and still be able to remain in the light-sport category. We recommend that the FAA ensure that glider designs with repositioned propellers and repositioned wheels are available for sport pilot use.

Flight review

One method of complying with the flight review requirement is to participate in the FAA Wings program. The Pilot Proficiency Awards Program (Wings) has specific requirements which include for airplanes, one hour of takeoffs and landings, one hour of air work, and one hour of instrument work. The instrument work may not be possible in a Light Sport Aircraft. We recommend that consideration should be given to this program, just as the requirements are slightly different for gliders in the Wings program. We believe sport pilots can benefit from participation in the Wings program with the added benefit of meeting the flight review requirement. We recommend that the Wings program be modified for sport pilots and light sport aircraft. Participation in the Wings program should meet the requirements for a flight review for sport pilots.

Recreational pilot

§ 61.101 Recreational pilot privileges and limits.

(b) A person who holds a current and valid recreational pilot certificate may act as pilot in command of an aircraft on a flight that is within 150 nautical miles from the departure airport, provided that person has:

(c) A person who holds a current and valid recreational pilot certificate may act as pilot in command of an aircraft on a flight that exceeds 150 nautical miles from the departure airport, provided that person has:

We recommend that the FAA consider extending the mileage limitation for the recreational pilot to 150 nautical miles. The sport pilot will not have any limitation as far as cross-country mileage. In order to encourage more individuals to take advantage of the recreational pilot certificate the cross-country mileage limitation should be extended to a reasonable amount. The training requirement established in 14 CFR section 61.99(a)(1) is adequate to ensure that the recreational pilot can safely navigate by using pilotage, dead reckoning and lost procedures. They are also tested on their cross-country navigation ability during the practical test. Additionally, the proposed change under section 61.101(d) will now allow recreational pilots to enter Class B, C, and D airspace provided they have the required training from an authorized instructor. They will be required to demonstrate knowledge and skill of using radios and navigation system/facilities.

Adding sport pilot to existing certificate

SFAR 89, Section 91 How do I obtain a sport pilot certificate if I already hold at least a private pilot certificate issued under 14 CFR part 61?

(a) If you already hold at least a current and valid private pilot certificate issued under 14 CFR part 61, and you seek to exercise the privileges of a sport pilot certificate, you may do so without any further showing of proficiency, subject to the following limits:

We recommend that this paragraph read that you already hold at least a *recreational* pilot certificate. The recreational pilot has already demonstrated knowledge and skill in many of the areas of operation required for the sport pilot certificate in applicable category and class.

Pilot certificate/medical certificate to instruct

Section 111 Must I hold an airman medical certificate?

While exercising the privileges of a flight instructor certificate with a sport pilot rating and while acting as pilot in command of a light-sport aircraft other than a glider or balloon, you must hold and possess;

- (a) A current and valid U.S. driver's license; or
- (b) A current and valid airman medical certificate issued under 14 CFR part 67.

We recommend that this section be reworded to:

Section 111. Must I hold an airman pilot and medical certificate?

While exercising the privileges of a flight instructor certificate with a sport pilot rating, you must hold and possess;

- (a) A current and valid sport pilot certificate with appropriate category and class endorsements and
- (b) A current and valid U.S. driver's license; or
- (c) A current and valid airman medical certificate issued under 14 CFR part 67.

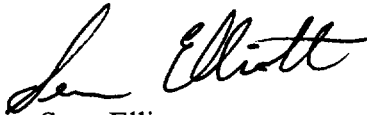
This brings the requirement of this regulation in line with the requirements of 14 CFR 61.183, which is to hold a pilot certificate in order to be a flight instructor.

Conclusion

NAFI would like to particularly emphasis the standards that this rule shall bring to many diverse yet "tied together" aviation communities. We firmly believe that standardization is key to safe operations and this rule will accomplish that while at the same time generate new interest in aviation.

We stand in support of this quality initiative and offer assistance in any way deemed helpful by the agency and its team.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Elliott". The signature is fluid and cursive, with the first name "Sean" written in a smaller, more compact script than the last name "Elliott", which is larger and more prominent.

Sean Elliott
President

cc: FAA Administrator Garvey, AOA-1
 FAA Associate Administrator for Regulation and Certification, AVR-1